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REMARKS

This application has been carefully reviewed in view of the above-referenced Office Action, and reconsideration is requested in view of the following remarks.

Regarding the Specification Amendment

The specification was objected to with regards to paragraph [0036]. It is noted that the application as originally filed correctly identifies the column as I, however, the font used has evidently resulted in a scanning error in the published application interpreting the column as a numerical 1. The above amendment is intended to assure that this is correct. The suggestion to use "L" is incorrect (see the sequence of Fig. 5). Reconsideration is respectfully requested.

Regarding the Milic-Frayling Reference

The undersigned has reviewed the Milic-Frayling reference and respectfully notes that the Office's interpretation of this reference's depiction of Fig. 1 is technically incorrect, and therefore, constitutes a defective basis for its use in the current rejections.

The Office Action asserts that the reference teaches "presenting a main window; presenting a secondary window adjacent the main window; displaying a remainder of the first image in the main window; displaying a remainder of the second image in the secondary window (Fig. 1)." (obviously quoting from the claim language). However, this is not in fact what is depicted in Fig. 1 of Milic-Frayling. In fact, Milic-Frayling relates to a completely different problem than that addressed by Applicant. In Milic-Frayling, the problem addressed is that of trying to display a web page designed for a display with a different aspect ratio such as the small display of a handheld device [0003]-[0004]. At Fig. 1, Milic-Frayling is actually displaying three separate images of a single display at three different horizontal scroll points. This is clearly explained at [0004] which states:

"One problem with this existing approach is that the incompatible sizes and aspect ratios of handheld devices or large screen displays do not accommodate a typical Web page designed for a desktop or laptop system. For example, Fig. 1 illustrates three parts of a Web page 100 as shown on a handheld device at different horizontal scroll points.

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An article 110 from Slate, an online magazine, is too wide to be displayed on a handheld device without horizontal scrolling. To read the article 110, the user must scroll horizontally back and forth as each line of text is read. This approach has very negative usability characteristics, including the loss of spatial context perceivable by the user. Users are relatively comfortable with scrolling down to read text, but users are less comfortable with horizontal scrolling (back and forth), particularly with every line of text. Likewise, if the Web page is displayed on a large screen display, such as in a convention hall in which the display is zoomed in to make the text large enough for the audience members to see, repeated horizontal scrolling is unworkable for most audiences.”

This explanation of the actual meaning of Fig. 1 clearly fails to meet the claim features quoted in the Office Action. Clearly, this is not a depiction of three side by side windows, but is three separate horizontal scrolled views of a single web page image. It is further noted that the content being scrolled does not originate from first and second images as claimed.

Regarding the Issue of 50% Overlap

The Office has taken the position that there is not disclosed criticality of the claim feature of “the first and second images overlap one another by at least 50%”. Applicant respectfully disagrees. A substantial portion of the specification deals with this issue in one way or another. The overlap is significant in certain claimed embodiments in that it permits the display of two adjacent windows – e.g., a main television window and a picture-in-picture television window (as is commonly available on many television sets) to be utilized in a novel way to permit a panning operation. By requiring that the overlap be at least 50%, one can guarantee that the two windows displayed on a television display can remain fixed in size (e.g., occupying half of the available picture area) rather than having to be adjusted in size as a pan is carried out. To look at it another way, at each extreme of the collection of images, the images on each end will always contain enough information to display at least half of the available panned image so that both the main and PIP windows do not have to be adjusted in size to accomplish the panning operation. The undersigned directs the Examiner’s attention, by way of example, to page 6, lines 16-17 of

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Applicant's specification which states: "The 50% overlap provides for the ability to have fixed size windows for the main and secondary (PIP) windows in order to provide the desired ability to pan." This can be further appreciated by study of the sequence of images depicted in Fig. 5 and the specification in general.

Regarding the Rejections under 35 U.S.C. §103

Claims 1-3, 6, 7, 8, 10-13, 16, 17, 22-25, 28-35 and 38-40 were rejected as unpatentable over Katayama in view of Milic-Frayling, both of record.

Regarding each of these claims, Applicant respectfully disagrees and requests reconsideration. As noted above, Milic-Frayling does not in fact teach or suggest that which it is alleged to teach. Hence, the claimed features of "presenting a main window; presenting a secondary window adjacent the main window; displaying a remainder of the first image in the main window; displaying a remainder of the second image in the secondary window" as asserted to be present in Fig. 1 are not in fact disclosed. Additionally, the claim feature regarding the 50% overlap has not been taken into consideration, but rather has been dismissed despite the clear indication of its relevance to the claimed embodiment as pointed out above.

In view of the above, it is clear that all claim features have not been properly identified in the cited references. The Examiner's attention is directed to MPEP 2143.03 which requires that all claim limitations must be taught or suggested in the cited references in order to establish *prima facie* obviousness. Failure of the Milic Frayling reference in this respect renders the combination with Katayama inadequate to establish *prima facie* obviousness. Reconsideration is respectfully requested.

Furthermore, regarding the proposed combination of references, the Office Action submits that the suggestion/motivation to make the proposed combination is "that displaying two different adjacent images into multiple windows to make panoramic image effect."[sic]. If this position is understood, it is respectfully submitted that the art fails to provide any such motivation to combine adjacent windows (e.g. using PIP) to create a panorama image. The art at most suggests combining overlapping images into a single image, but the undersigned is unable to find any suggestion of use of adjacent windows such as a PIP window and a main image

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window. This suggestion comes only from an impermissible hindsight reconstruction of the art using Applicant's teachings. While Applicant is aware that some hindsight is unavoidable in making an analysis of patentability, there must be evidence of record to support the combination, and all claim features must be met by the art in some manner. That is not the case here. Reconsideration and allowance are respectfully requested.

Regarding claims 1-3, 6, 7 and 8, the above remarks regarding the 50% overlap are applicable to this embodiment in that it permits the windows to remain fixed size occupying half of the display (for example). Accordingly, this claim feature should be accorded patentable weight as there is no teaching or suggestion of this feature in any of the cited references and the feature is critical to keeping the window sizes the same as the image is panned to simplify the panning process. Reconsideration is respectfully requested.

Further regarding claim 3, the Office Action asserts that Milic-Frayling teaches that the composite image is displayed on a television display and wherein the secondary window comprises a PIP window. This is asserted to be shown in Fig. 1 and Fig. 15. As noted above, this is an incorrect interpretation of Fig. 1. Fig. 15 shows only a general purpose computer that is used to implement the disclosed "smartview" display as explained in the reference. There is no teaching or suggestion identifiable by the undersigned to the claim features asserted to be disclosed. In fact, the terms "PIP" or "picture in picture" and like terms do not even appear in the text of the specification. Reconsideration is respectfully requested.

Further regarding claim 6, the Office Action asserts in essence that the added features of this claim are present in Milic-Frayling. However, there appears to be no first and second images that are combined to make up the panned view. Instead, the displayed view is that of a segment of a single image (a web page designed for a different aspect ratio display). Reconsideration is respectfully requested.

Further regarding claim 7, while Milic-Frayling shows a computer system, the other devices claimed do not appear shown, and the multiple images and combination of multiple images in adjacent windows remain neither taught nor suggested.

Claims 4, 9, 14, 18, 21, 26 and 36 were rejected as unpatentable over Katayama in view of Milic-Frayling and further in view of Teshima.

Regarding each of these claims, Applicant respectfully disagrees and requests reconsideration. The above remarks regarding Milic-Frayling, the combination of Katayama with Milic-Frayling and the issue of the 50% overlap are equally applicable.

Regarding the alleged disclosure in Teshima of paragraphs [0140] and [0141], Applicant fails to find the required disclosure necessary to provide the teaching of identifying images within a transport stream using packet identifiers. File names and client codes are discussed, but these are not the equivalent of packet identifiers (PIDs). (It is noted that PIDs are used within transport streams to identify separate content streams - e.g., multiple television video channels in a single digital transport stream will bear differing PIDs to distinguish therebetween, and separate elementary streams of a single channel are identified by differing PIDs, however Applicant knows of no situation where multiple overlapping video scenes in a transport stream are separately identified using separate PIDs for combination into a panned image as taught and claimed.)

Hence, it is submitted that Teshima further fails to disclose that which is asserted to be disclosed. This failure along with the failures of the Milic-Frayling reference renders the rejection improper for failure to properly assemble a combination of references that teach or suggest each of the claim features.

Regarding the asserted motivation for making the combination ("that images could be quickly identified without loading whole image" [sic]), it is noted that this alleged motivation would appear to have nothing to do with the claimed invention since the images are disclosed as multiple parts of a transport stream and are thus being transported without regard for the PIDs. The undersigned is at a loss to understand the Examiner's reasoning. The Examiner has apparently misconstrued the technology in some way to arrive at this conclusion. Hence, a telephone conference is respectfully requested to clarify the technology for the Examiner and/or reach an understanding of the reasoning asserted.

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Claims 5, 15, 20, 27 and 37 were rejected as being unpatentable over Katayama in view of Milic-Frayling and further in view of Bohnenkamp.

The above remarks with respect to Milic-Frayling and the combination of Katayama with Milic-Frayling are equally applicable. Bohnenkamp is used for its alleged disclosure of use of PIDs within a recorded medium. However, the Office references paragraphs [0140] and [0141] again, and this reference seems inapplicable to the Bohnenkamp reference which is printed with column and line numbers but without paragraph numbers. That said, it again appears that this reference uses identifying information for images, but the reference appears devoid of reference to packets or packet identifiers in identifying such an image. Clarification of the Examiner's position, if maintained, is respectfully requested.

In view of the above-noted failures in the proposed combination of references, it is submitted that claims 5, 15, 20, 27 and 37 are patentable. Reconsideration and allowance are respectfully requested at an early date.

Regarding claims 8-18 and 20-40, the Examiner has relied upon reasoning associated with the rejections of claims 1-8. Responsive thereto, the undersigned similarly refers the Examiner to the above responses to rejection of those claims.

Concluding Remarks

The undersigned additionally notes that many other distinctions exist between the cited art and the claims. However, in view of the clear distinctions pointed out above, further discussion is believed to be unnecessary at this time. Failure to address each point raised in the Office Action should accordingly not be viewed as accession to the Examiner's position or an admission of any sort.

Several minor amendments were made to the claims to correct grammatical errors and the like. No amendment made herein was related to the statutory requirements of patentability unless expressly stated herein. No amendment made was for the purpose of narrowing the scope of any claim unless an argument has been made herein that such amendment has been made to distinguish over a particular reference or combination of references.

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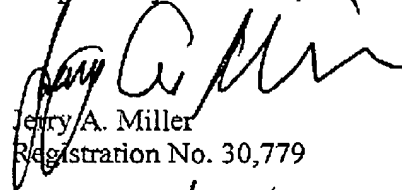
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Interview Request

In view of this communication, all claims are now believed to be in condition for allowance and such is respectfully requested at an early date. If further matters remain to be resolved, the undersigned respectfully requests the courtesy of an interview in order to expedite this application to allowance. The undersigned can be reached at the telephone number below.

Respectfully submitted,


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Dated: 3/19/07

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